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7 Attorney for Cristell Lopez

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 CRISTELL LOPEZ,

14 Defendant.
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Case No. 2:16-cr-010-GMN-GWF

**STIPULATION TO ADVANCE
SENTENCING HEARING**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.
19 Ojeda, Assistant Federal Public Defender, counsel for Cristell Lopez, that the Sentencing
20 Hearing currently scheduled on December 22, 2016 at 10:30 a.m., be vacated and advanced to
21 a date and time convenient to the Court. Counsel for the Government will be unavailable
22 December 12, 2016 – December 15, 2016 and December 22, 2016 – December 23, 2016.

23 This Stipulation is entered into for the following reasons:

- 24 1. The defendant is in custody and agrees with the need for the advancement.
25 2. Counsel for the Government will be unavailable during the currently scheduled
26 hearing.

3. Denial of this request for advancement could result in a miscarriage of justice.

4. The parties agree to the advancement.

This is the first request for an advancement of the sentencing hearing.

DATED this 1st day of December, 2016.

RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

By /s/ Heidi A. Ojeda
HEIDI A. OJEDA
Assistant Federal Public Defender

By /s/ Susan Cushman
SUSAN CUSHMAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CRISTELL LOPEZ,

7 Defendant.

Case No. 2:16-cr-010-GMN-GWF

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
12 Thursday, December 22, 2016 at 10:30 a.m., be vacated and advanced to December 20, 2016
13 at the hour of 9:00 a.m.

14 DATED this 5 day of December, 2016.

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17 UNITED STATES DISTRICT JUDGE
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